

Enfield Council

Draft Strategic Housing Land Availability Assessment (SHLAA) Methodology – Consultation Statement

November 2020

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1. Introduction

1.1. Background

- 1.1.1. The Council has prepared a Strategic Housing Land Availability Assessment (SHLAA) Methodology to help inform the preparation of the SHLAA for Enfield. The methodology outlines a technical process to help identify and assess the quantity and potential new land suitable for housing development.
- 1.1.2. A draft of the Methodology was consulted on in October 2020 to help refine the council's approach. Although public consultation as part of the SHLAA production process is not required, we consulted on the draft methodology to enable stakeholders to have the opportunity to input and help refine the methodology before we began production of the SHLAA.
- 1.1.3. This consultation statement sets out the responses received and the council's response to them.

1.2 The Enfield SHLAA

- 1.1.4. The purpose of the SHLAA is to identify future supply of land which is suitable, available and achievable for housing uses over the local plan period.
- 1.1.5. The SHLAA does not allocate any specific sites or suggest that planning permission be given on them. The emerging Local Plan for Enfield will determine which and how many sites should go forward and where they should be. Nonetheless, it is a required part of the evidence base needed for the preparation of a Local Plan. The NPPF requires Local Plans to identify a supply of specific, deliverable sites for years one to five of the plan period (with an additional buffer of 5% or 20%, moved forward from later in the plan period), and specific sites or 'broad locations' for years 6 to 10, and if possible for years 11- 15.
- 1.1.6. The overall approach of Enfield's SHLAA will be broadly in line with the London Plan Strategic Housing Land Availability Assessment (SHLAA) 2017¹ and updated in line with current national guidance and local progress. The assessment is an important source of evidence to inform the emerging Enfield Local Plan and decision-taking, and the identification of a five-year supply of housing land and seeks to establish realistic assumptions about development potential of the land identified and when development is likely to occur. It provides an update to the London Plan Strategic Housing Land Availability Assessment.
- 1.1.7. Furthermore, the Enfield's SHLAA will inform the following:
- Local Plan housing policies;
 - Infrastructure planning;
 - Five-Year Housing Land Supply calculations; and
 - Enfield's Brownfield Land Register.

¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/strategic-housing-land-availability-assessment>

2. Consultation on the draft SHLAA Methodology: who was consulted and how?

2.1. Consultation on the draft SHLAA Methodology

2.1.1. The draft SHLAA Methodology was approved for public consultation on **October 2020**.

2.1.2. The Council consulted on the draft SHLAA Methodology for two weeks from **Thursday 15 October to Thursday 29 October 2020**.

2.1.3. The Council has sought views from a range of organisations on the suitability of the approach. This included specific consultee bodies², other local planning authorities, community organisations, developers and agents, and a range of other national, regional and local organisations, and other individuals with a stated interest in the area or local to the area. Emails and letters were sent to the relevant consultees. The consultees are listed in Appendix A and an example email/letter is contained in Appendix B.

2.1.4. The methods of notification included:

- Online on the council's website;
- Via email to previous respondents to the Council's Call for Sites; and
- Members Newsletter.

2.1.5. Comments were made by:

- Emailing localplan@enfield.gov.uk
- Writing to Strategic Planning and Design, Enfield Council, FREEPOST, NW5036 EN1 3BR

2.1.6. Contact details for further information were also made available as follows:

Email: localplan@enfield.gov.uk

Telephone: 020 83793866

² Specific consultation bodies and duty to cooperate bodies required under the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended

3. What issues were raised and how were they taken into account in the final document?

3.1. What responses were received?

3.1.1. We have received 30 representation from individual or groups.

3.1.2. The table below sets out a summary of the nature of the comments received and how these comments have been taken into account. Full details of each response received with proposed changes is recorded within the **Appendix D**.

#	Nature of Comment	How this has been taken into account
1	Inadequate consultation period and inadequate publicity of consultation.	The concern is noted. The consultation is not a statutory consultation, but a technical consultation to improve the methodology. Public consultation on the draft SHLAA methodology is not mandatory. Nevertheless, the council have sought views from stakeholders to provide them the opportunity to input and help refine the methodology before we begin the study.
2	The SHLAA Methodology should highlight the ways in which the Council's SHLAA methodology deviates from the GLA's SHLAA methodology.	Further clarity will be provided as appropriate.
3	Consideration of whether the harm to the Green Belt from development of a site compared to the community benefits should not be contained within a SHLAA.	The SHLAA will not make such judgements. It is for the modelling stage of the future strategic and alternative growth options that will bring together the collective consideration of Local Plan technical evidence.
4	Further clarity is required on how previously developed land within the Green Belt will be assessed.	Further clarity will be provided as appropriate.
5	Relying on what the Green Belt study considers to be sites which make lower contribution could bake in errors into the SHLAA. Suggest it is only acceptable if the SHLAA can be reviewed/revised after published.	Noted. The SHLAA will be a living document that is updated annually. This will allow the SHLAA findings to be updated and revised following publication of any technical evidence relating to the Green Belt.

6	Sites which provide low contribution to MOL should be assessed in the same way as sites which give low contribution to Green Belt.	The methodology has been updated to reflect this.
7	Do not agree that SINC and SSSI designations should be included as absolute constraints.	SSSIs will continue to be treated as an absolute constraint in line with regulations. SINCs will be moved to level 2.
8	Critical infrastructure can impact on deliverability which should feed into suitability viability and deliverability.	Noted. This will be taken into consideration.
9	Undesignated employment sites should not automatically be considered for housing if they are no longer needed for employment. What makes a site acceptable in employment terms does not also apply to housing sites.	Policy E7 of the ItP London Plan sets out criteria for mixed use/ residential development on non-designated sites. Such development would only be supported if there is no reasonable prospect of the site being used for industrial and related purposes. This approach aligns with the SHLAA employment criterion which states 'sites which are designated or in economic use will generally be deemed unsuitable for alternative uses.'
10	Further detail is required on the approach that will be adopted if a site is located partially within a constrained area.	Further clarity will be provided in line with national planning practice guidance.
11	Which facets of sustainability as part of the site survey should be explicitly set out.	Noted. This will be reviewed and amended as appropriate.

Appendices

- A. List of consultees consulted
- B. Text of emails/letters sent to consultees
- C. Screenshot of Consultation page
- D. Full schedule of proposed changes – representations made

Appendix A: List of consultees

The following “specific consultation bodies” were consulted on the draft SHLAA Methodology.

- Coal Authority
- Environment Agency
- Highways England
- Historic England
- Marine Management Organisation
- Natural England
- Network Rail
- Neighbouring Local Planning Authorities (Waltham Forest Council, Barnet Council, Haringey Council, Hertfordshire County Council, Welwyn & Hatfield, LVRPA, Broxbourne, Hackney, Hertsmere, Essex CC, East Herts CC, and Epping Forest CC.)
- Homes England
- Greater London Authority
- Thames Water
- Transport for London
- British Waterways
- Telecommunication providers including BT and Virgin media
- Gas and electricity suppliers including National Grid and British Gas.

In addition to the above list, a number of other general bodies were consulted including:

- Enfield Disability Action
- Enfield Racial Equality Council
- North Middlesex Hospital – NHS Trust

All those parties that submitted call for sites at the last stage were also notified.

Appendix B: Text of emails / letters sent out to consultees

Enfield's Draft Strategic Housing Land Availability Assessment (SHLAA) Methodology Consultation

Dear All,

As part of the local plan process, we are undertaking a Strategic Housing Land Availability Assessment.

A SHLAA seeks to identify potential land for housing (including Gypsy and Traveller sites and affordable housing). The SHLAA is an important source of evidence to inform plan-making, and it is the role of the SHLAA to provide information on the range of sites which are potentially available to be developed. The SHLAA is an evidence document only and **does not** in itself allocate land for any specific purposes; allocations will be determined through the Local Plan.

Sites which have been submitted through the 'Call for Sites' will be assessed using the SHLAA methodology (when finalised), which has been written in accordance with National Planning Practice Guidance. **We would welcome your comments on the proposed approach to assess sites, particularly in terms of viability, and the weight given to both policy and physical constraints.**

This consultation will run for a period of two weeks between **Thursday 15 October to Thursday 29 October 2020**.

All comments should be received by **5pm on 29 October**

Please email your comments to: localplan@enfield.gov.uk

The Draft SHLAA Methodology can be viewed here:
<https://new.enfield.gov.uk/services/planning/local-plan/#13>

Please direct any queries to the Plan Making team at localplan@enfield.gov.uk or 020 83793866

Appendix C: Screenshot of Consultation page

Local Plan

New Local Plan	Core Strategy 2010	Development Management Document	North London Waste Plan	Monitoring	Latest news
Local Development Scheme	The Local Self Build Register	Brownfield Land Register	Policies map	Call for sites	Evidence base
Strategic Housing Land Availability Assessment					

Strategic Housing Land Availability Assessment

As part of the Local Plan process, we are undertaking a Strategic Housing Land Availability Assessment (SHLAA).

The aim of the SHLAA is to identify potential land for housing (including Gypsy and Traveller sites and affordable housing). The SHLAA is an important source of evidence to inform plan-making, and will provide information on the range of sites which are potentially available to be developed. **The SHLAA is an evidence document only** and does not allocate land for any specific purposes. Allocations will be decided through the Local Plan.

Sites which have been submitted through the Call for Sites will be assessed using the SHLAA methodology (when finalised), which has been written in accordance with National Planning Practice Guidance. **We welcome your comments on the proposed approach to assess sites, particularly in terms of viability, and the weight given to both policy and physical constraints.**

The council will be consulting on a [draft methodology \(PDF\)](#) for the SHLAA from 15 October to 29 October 2020. You can submit your comments by email to localplan@enfield.gov.uk. All comments should be received by 5pm on Thursday 29 October 2020.

Please direct any queries to the 'Plan Making team' at localplan@enfield.gov.uk or 020 8379 3866.

Appendix D: Full schedule of representations made and Council response

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
001	Innovative Infill	<p>Innovative infill has noted that they identified around 2,000 plots across Enfield, as part of Call for Sites submission to the Enfield in March 2020.</p>	<p>Noted.</p>
		<p>States that “section 2.11 of the draft methodology states that a site should have capacity for at least 5 new homes. By omitting sites accommodating fewer than this, the Council is consciously eliminating sites which historically represent 25% of the borough’s housing supply.”</p>	<p>Sites beneath 5 homes will be captured as part of the windfall assessment component of the SHLAA.</p>
		<p>States that the ‘while rigorous information-gathering and multi-stage assessment methodology proposed in the consultation draft seems appropriate if used to appraise one or two hundred prospective sites, it clearly would not be feasible if applied to several thousand small sites. However, the unsuitability of one possible methodology is not sufficient reason to wholly discount small sites from this exercise, without at least giving consideration to alternative methodologies which may be more suited to the number and nature of the sites in question. A methodology designed to appraise a large number of small sites will of necessity be different to that used to appraise a small number of large sites. The viability of larger sites is influenced by numerous constraints and complexities, many of which are specific to each site, and which the Council’s detailed methodology is well placed to examine’.</p> <p>The approach below has been suggested to improve the robustness of the evidence base generated by the Enfield SHLAA without intensive use of council resources, which contain potential SHLAA Small Sites Methodology:</p>	<p>The suggested approach regarding potential SHLAA Small Sites Methodology is noted.</p>

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		<p>1: High level scoping of development pattern of each typology in the Enfield Characterisation Study</p> <p>2: Identification of recurring small site types with potential for policy compliant redevelopment</p> <p>3: Codification of key parameters of relevant site types for each character typology</p> <p>4: Analysis of OS Mastermap GIS data using codified parameters to identify longlist of potential sites</p> <p>5: Review and filter of longlist to eliminate unsuitable sites (including constraints as per 2.22)</p> <p>6: Output of statistical data on prevalence of suitable small sites across the borough.</p> <p>7: Focused survey work to identify likely rate(s) of release different sites types</p> <p>7: Mathematical modelling of availability of sites under various scenarios</p>	
002	Individual	This representation mentioned that 'the Draft SHLAA Methodology does not allow for assessing the possibility of investigating the number of empty rooms above shops and bringing them into residential use'.	The intention of this draft SHLAA is the generate a methodology used to identify, new land suitable for housing development, the number of empty rooms above shops and bringing them into residential use is out scope.
003	Enfield Road Watch	The nature of this representation is an objection, they noted that consultation covers important issues and has not been sufficiently publicised nor does its length of run adequately long enough for residents to become aware of it and respond in numbers.	The concern is noted. The consultation is not a statutory consultation, but a technical consultation to improve the methodology. Public consultation on the draft SHLAA methodology

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
			is not mandatory. Nevertheless, the council have sought views from stakeholders to provide them the opportunity to input and help refine the methodology before we begin the study.
		It is stated that the that there is much discretionary wording that causes concern. On p9, paragraph 2.12 the document lists the constraints that would totally exclude sites from consideration, it does not include Green Belt/MOL. Grade 3 land is productive and should be valued for food security, environmental benefits, employment opportunities and other factors.	The approach to the absolute constraints within the SHLAA is in line with the National Planning Practice Guidance. With regards to Green Belt/MOL, the SHLAA is a technical assessment only - to identify quantity and potential new land suitable for housing development. It does not allocate any specific sites or suggest that planning permission be given on them.
		An extensive survey of potential brownfield/previously-developed sites in the borough, was shared with Planning and the Council, for up to 35,000 new homes without encroaching on Green Belt or MOL.	The survey of potential brownfield/previously developed land in the borough submission of part of the Call for Sites will be considered in line with the proposed SHLAA methodology.
		The NPPF states that “It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area.”	Noted. The National Planning Practice Guidance also requires sites to be considered in relation to their availability. Factors that

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		<p>Concern in relation to paragraph 2.22 “Sites where the Green Belt assessment suggests land makes a lower contribution to the purposes of Green Belt will generally be deemed potentially suitable with regards to this factor. Sites where analysis suggests the land makes an important contribution to the purposes of Green Belt will generally be deemed unsuitable. Exceptions might occur for sites which are previously developed, where there are specific industrial requirements, where development would support community aspirations or where there are specific sustainability benefits.” Similar concerns also expressed in relation to the approach to Public Open Space and Local Green Space as well as Historic Parks and Gardens and Scheduled Ancient Monuments and Allotments.</p>	<p>can be considered when assessing availability include where there is confidence that there are no legal or ownership impediments to development.³</p> <p>Whilst Green Belt will not be considered an ‘absolute’ constraint, it is listed as a policy constraint alongside others. Sites which make a lower contribution to the Green Belt purpose will only be considered ‘potentially suitable’ the definition of which is set out within the Draft SHLAA methodology. This states “the development plan process will determine the future suitability for the defined use”. The SHLAA still recognises the policy constraint, and other evidence will be required to assess the suitability of the development potential of sites.</p>
004	Hertfordshire County Council	No comments to make on this consultation. HCC do not have any landholdings in Enfield.	No action

³ Paragraph: 019 Reference ID: 3-019-20190722

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
005	Organisation representing a landowner	<p>Two specific comments on points has been noted.</p> <p>1 Weight applied to SINC: the SINC (or Local Wildlife Sites) are not always used as an initial filtering or exclusion criteria at this early step. Typically we would not give SINC that degree of weight in the SHLAA appraisal process.</p>	<p>Noted. The approach to SINC will be reviewed and revised in line with relevant guidance and legislation.</p>
		<p>2 Criteria around Green Belt exclusions: further criteria or clarification on which Green Belt sites should be considered potentially suitable might be helpful. More importantly, we think the criteria needs to also explicitly refer to Green Belt that is “well-served by public transport” as being an exception where high performing Green Belt will be considered potentially suitable. This is necessary to be consistent with NPPF para 138 which seeks to prioritise such land (alongside PDL) when considering any need for Green Belt release. How the method might determine ‘well-served by public transport’ could, for example, be around adjacency to existing railway stations.</p>	<p>Noted. The proposed SHLAA methodology is in line with National and London policy.</p>
006	Individual	<p>The comment seeks clarification on paragraph 1.7 which states that “the overall approach of Enfield’s SHLAA will be broadly in line with the London Plan”. The comment should be expanded to explicitly state how it deviates, because, inter alia, the difference with respect to Green Belt and designated open spaces is material.</p>	<p>Noted. The SHLAA will set out any deviation clearly.</p>
		<p>1.8 states that “Most of the sites are submissions from landowners and developers”. Where is the list and what proportion was proposed by landowners, developers and third parties respectively.</p>	<p>This refers to sites received through the call for sites exercise. This will be published in due course as part of the SHLAA.</p>

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		<p>Section 2.18 indicates that third parties can propose sites. This leaves the scheme open to abuse and could put undue pressure on the landowners, as inclusion on the list implies tacit approval, notwithstanding the somewhat disingenuous comment that it does not.</p>	<p>The SHLAA does not allocate sites. Not all sites assessed will be considered suitable for development.</p>
		<p>Pg 3 – shouldn't footnote 1 refer to NPPF paragraph 67 rather than 159?</p>	<p>Correct. This was an error and will be corrected in the final SHLAA methodology.</p>
		<p>2.22 Green Belt assessment suggests land makes a lower contribution to the purposes of Green Belt will generally be deemed potentially suitable..”, and similarly leaves the door open to development on other open/green spaces.</p> <p>This differs materially from London's SHLAA, which states that “The SHLAA system automatically classified sites overlapping with Green Belt, Metropolitan Open Land and other designated open space in the London Plan as “unsuitable” by the system and deemed to have a zero per cent probability for development”, and Policy 7.16 states that “The strongest protection should be given to London's Green Belt, in accordance with national guidance”.</p>	<p>Noted. Any difference in approach will be highlighted. Green Belt is listed as a policy constraint alongside others. Sites which make a lower contribution to the Green Belt purpose will only be considered ‘potentially suitable’ the definition of which is set out within the Draft SHLAA methodology. This states “the development plan process will determine the future suitability for the defined use”. The SHLAA still recognises the policy constraint, and other evidence will be required to assess the suitability of the development potential of sites.</p>
007	Chase Ward Cllrs	<p>Approves in principle with the intentions underpinning the SHLAA. Methodology aligns in most respects with the national standards. However, are concerned with the discretionary adaptations made to take account of local circumstances, suggestions include:</p>	<p>Noted. Should there be a need to consider release of land in Grade 3 for development, surveys will be</p>

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		The omission of Grade 3 Agricultural Land from 2.12, Table 2: (Constraints on basis of which sites to be excluded and 2.23 Table 5: Environmental and policy criteria on basis of which sites to be excluded- no soil (or other) assessment has been done to determine the extent to which the Grade 3 land in Enfield is 3a.	undertaken to assess their categorisation and suitability.
		The exclusion of the Green Belt in Table 5 “Level 1 – Sites to be excluded” but its inclusion in Table 5 “Level 2 – Sites with policy constraints to be considered”, we consider inappropriate as local determinants.	This is in line with national planning practice guidance. Green Belt is not an absolute, but a policy constraint.
008	Individual	This representation objected to opposed to both building on park land or implementing backland development, and asks a few questions, around the availability council-owned parks and open spaces.	The draft SHLAA methodology lists the sources of sites to be considered and the approach to considering absolute and policy constraints.
		The public should be consulted at each stage of SHLAA preparation.	This is not required in line with the Council’s SCI and is not considered a proportionate approach.
		The report and updates should be made available to the public.	Noted. The SHLAA and subsequent updates will be published on completion.
009	Thames Water (Savills)	This representation comments on the draft Methodology consultation: Stage 2: Site/Broad Location Assessment	SSSIs benefit from statutory protection and therefore are to be considered an absolute constraint. The approach to SINC’s will be

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		<p>Tables 2 & 5 sets out the constraints for which sites will be excluded if they lie wholly within the constraint designation.</p> <p>Tables 2 & 5 includes SSSI and SINCs. It is considered that these should not be treated as absolute constraints. The sites being considered could only account for a small part of the constraints designated area. For example, a number of our reservoirs are designated SSSIs and the designation covers the whole of the water body and the surrounding embankments, but, the majority of the value is on the water body for the overwintering wild fowl. Potentially part of the land around the water body could be developed with no detrimental impact on the wider water body/SSSI.</p> <p>Potential release of Sites of Importance for Nature Conservation could also facilitate enabling development which could lead to Biodiversity Net Gain. Therefore, such constraints should not be treated as absolute to rule a site out.</p>	<p>reviewed and revised in line with relevant guidance and legislation.</p>
010	Individual	<p>Provides comments on the Draft Methodology. Assumes the methodology is an intensification of existing practices and is intended to be compatible with the imperatives of the “Planning for the Future” White Paper. A seriously questionable document in terms of local democratic accountability and environmental protection - local residents will want solid assurances that allocations of sites arising from the revised Local Plan will be subject to proper public consultation.</p> <p>The SHLAA’s “estimates” of housing potential for each site, arrived at against a background of very high local housing need targets, will have an unavoidable influence on developers’ proposals. These in turn seem likely, as per the White Paper, to be subject to a local planning oversight that will have been seriously weakened. Can imagine a similar effect arising from the notion of a housing design typology (see para 2.37) even though it is ostensibly not a model for acceptance under the planning approval process.</p> <p>It is worrying that Public Open Land, while classed as in principle unsuitable, is not in the list of Excluded sites (see para 2.12).</p>	<p>The SHLAA methodology will be aligned with current guidance. If this is updated the SHLAA methodology and SHLAA will subsequently be updated to reflect up to date guidance.</p> <p>The estimated capacity in the SHLAA are not intended to inform planning decisions. Individual proposals will be assessed through the planning application process.</p> <p>The proposed approach is in line with relevant guidance and legislation.</p>

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		<p>Ominous also are Para. 2.48's references to the "Planning for the Future" White Paper and to wrangles over the London Plan under which LBE's annual housing "need" target rises from 1117 to 2213. As mentioned above, the Methodology clearly presupposes a response by the Council to central pressure to find sites and to squeeze the maximum out of them. Stage 4 of the SHLAA , the assessment review, requires that, if targets have not been met, "unsuitable" sites, including those in previously rejected development applications, will be revisited - see para 2.5. What this procedure promises for housing quality and housing densities can easily be imagined.</p>	<p>The Council's approach to housing targets and housing need will be in line with relevant national/regional policy and guidance.</p>
011	Hadley Wood Neighbourhood Planning Forum	<p>The Hadley Wood Neighbourhood Planning Forum strongly objects to proposed changes in the criteria for development within the Green Belt, MOL, Public Open Space and Local Green Space that are included in the draft SHLAA.</p>	<p>Noted.</p>
012	Hertfordshire CC	<p>No comments, at this stage Hertfordshire County Council.</p>	<p>No action required.</p>
013	Federation of Enfield Residents and Allied Associations (FERAA)	<p>This representation suggests that the methodology subtends the principles and mission objectives of the borough. The representation cites a number of factors. This includes that there is no shortage of space for regeneration in Enfield. Brownfield is adequate for internal borough needs. Open spaces are a final reserve and the LBE of course must realise that high density developments it has authorised have virtually no healthy recreational facilities. Furthermore, the proposals exclude Grade 1 and 2 land, but this is wholly deceptive for reasons well known to LBE.</p>	<p>The proposed SHLAA methodology will be aligned with national policy and guidance.</p>

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
014	Metropolitan Police Service	A request to inform the NE Designing our Crime Unit of all relevant decisions regarding to proposed & future land availability for Residential, School, Commercial, Retail, Hospital, projects including Gypsy & Traveller pitches.	Noted.
015	Les West Planning	This representation notes that the criteria for Green Belt/MOL needs to include an equivalent sentence to match that made about the sites with a lower contribution to the purposes of Green Belt for sites in MOL. The current draft does not appear open up MOL sites to be considered in the same way.	Noted. The proposed approach to assessing MOL and Green Belt will be consistent.
016	Prepared by Icen Projects on behalf of Fairview New Homes	This representation suggests a number of recommendations, including: Suggests that “Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development” within Step 1 is too vague.	The need to add further detail will be reviewed.
	("Fairview")	Suggests removal of Grade 1 and 2 agricultural land from Table 2 as there is none in the borough.	Inclusion of this constraint is in line with relevant guidance and legislation.
		The absence of critical infrastructure for sites in more isolated locations (should be a key consideration (particularly around timeframes) that is flagged as part of the assessment process.	Noted. This will be considered.
		Step 3 (Green Belt / MOL) – would accept the approach to considering sites within the Green Belt if there was a clear mechanism to challenge the Green Belt study conclusions and have the SHLAA assessment subsequently amended.	Noted. The SHLAA will be a living document that is updated annually. This will allow the SHLAA findings to be updated and revised following publication of any technical evidence relating to the Green Belt.

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		Step 3 (Green Belt / MOL) – concerned about exceptions for PDL. Considerations about whether or not the redevelopment of site’s harm to the Green Belt, balanced against the community benefits and strategic objectives are a balancing decision which should not be contained within the SHLAA.	The SHLAA will not make such judgements. It is for the modelling stage of the future strategic and alternative growth options that will bring together the collective consideration of Local Plan technical evidence.
		Do not consider that undesignated employment sites should get a ‘free pass’ through the assessment process. What makes a site acceptable in employment terms, does not also apply to housing sites.	Noted. This will be reviewed.
		Table 5 refers to constraints including Flood Risk Zone 2 and contamination, but does not note the approach that will be taken if sites are partially constrained by such factors.	Noted. Further clarity will be provided within the final SHLAA methodology.
		A site location plan of landholding is attached, alongside a masterplan of the site illustrating potential capacity.	Noted.
017	Prepared by Icenii Projects on behalf of London Diocesan Fund	Availability of public land can often be questionable even when there is a high-level desire for sites to be released. As such, we would recommend that any public sector sites should be supported by additional information about their date of their availability and the disposal strategy to confirm they really will be brought forward.	Noted. The Council will take a proportionate and consistent approach for assessing availability of all sites considered.
	("LDF"), relating to Land	Suggests that “Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development” within Step 1 is too vague.	The need to add further detail will be reviewed.

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
	Opposite the Jolly Farmers Public House	Suggests removal of Grade 1 and 2 agricultural land from Table 2 as there is none in the borough.	Inclusion of this constraint is in line with relevant guidance and legislation.
The absence of critical infrastructure for sites in more isolated locations (should be a key consideration (particularly around timeframes) that is flagged as part of the assessment process.		Noted. This will be considered.	
Step 3 (Green Belt / MOL) – would accept the approach to considering sites within the Green Belt if there was a clear mechanism to challenge the Green Belt study conclusions and have the SHLAA assessment subsequently amended.		<p>The draft SHLAA methodology states that sites within the Green Belt will be considered 'potentially suitable.' The definition of this is set out within the draft SHLAA methodology.</p> <p>Noted. The SHLAA will be a living document that is updated annually. This will allow the SHLAA findings to be updated and revised following publication of any technical evidence relating to the Green Belt.</p>	
Step 3 (Green Belt / MOL) – concerned about exceptions for PDL. Considerations about whether or not the redevelopment of site's harm to the Green Belt, balanced against the community benefits and strategic objectives are a balancing decision which should not be contained within the SHLAA.		The SHLAA will not make such judgements. It is for the modelling stage of the future strategic and alternative growth options that will bring together the collective consideration of Local Plan technical evidence.	

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		Do not consider that undesignated employment sites should get a 'free pass' through the assessment process. What makes a site acceptable in employment terms, does not also apply to housing sites.	Noted. This will be reviewed.
		Agree that genuine public open space should not be deemed suitable, so it will be important that the criteria for what is considered open space is clearly set out in the Methodology.	Noted. Further clarity will be added to the final SHLAA methodology to clarify how the approach relates to existing policy designations.
		Table 5 refers to constraints including Flood Risk Zone 2 and contamination, but does not note the approach that will be taken if sites are partially constrained by such factors.	Noted. Further clarity will be provided within the final SHLAA methodology.
		We support the consideration of site viability, particularly considering the Strategic Infrastructure costs related to larger sites. We have seen other local authorities struggle at Examination stage bringing forward large new communities as the infrastructure costs have not been realistically assessed. This should form an important consideration and the use of Government funding should only be factored in where there is significant progress in securing it.	Noted.
		We support the consideration of appropriate timescales for individual sites, but we consider it is important that infrastructure delivery timeframes are considered at this stage. Where funding is not progressed for significant and critical pieces of infrastructure then the relevant adjustments should be made to the site assessment.	Noted. A consistent approach will be applied across all sites requiring strategic infrastructure.
		We support the use of masterplans to guide assumptions about site density.	Noted.

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		A site location plan of landholding is attached, alongside a masterplan of the site illustrating potential capacity.	Noted.
018	Prepared by Icen Projects on behalf of London Diocesan Fund ("LDF"), relating to Land at Jesus Church, Forty Hill.	Availability of public land can often be questionable even when there is a high-level desire for sites to be released. As such, we would recommend that any public sector sites should be supported by additional information about their date of their availability and the disposal strategy to confirm they really will be brought forward.	Noted. The Council will take a proportionate and consistent approach for assessing availability of all sites considered.
		Suggests that "Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development" within Step 1 is too vague.	The need to add further detail will be reviewed.
		Suggests removal of Grade 1 and 2 agricultural land from Table 2 as there is none in the borough.	Inclusion of this constraint is in line with relevant guidance and legislation.
		The absence of critical infrastructure for sites in more isolated locations (should be a key consideration (particularly around timeframes) that is flagged as part of the assessment process.	Noted. This will be considered.
		Step 3 (Green Belt / MOL) – would accept the approach to considering sites within the Green Belt if there was a clear mechanism to challenge the Green Belt study conclusions and have the SHLAA assessment subsequently amended.	<p>The draft SHLAA methodology states that sites within the Green Belt will be considered 'potentially suitable.' The definition of this is set out within the draft SHLAA methodology.</p> <p>Noted. The SHLAA will be a living document that is updated annually. This will allow the SHLAA findings to be updated</p>

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
			and revised following publication of any technical evidence relating to the Green Belt.
		Step 3 (Green Belt / MOL) – concerned about exceptions for PDL. Considerations about whether or not the redevelopment of site’s harm to the Green Belt, balanced against the community benefits and strategic objectives are a balancing decision which should not be contained within the SHLAA. If there are Green Belt harm issues related with a site, this should form part of the site selection process and the decision should not be hidden away in the SHLAA.	The SHLAA will not make such judgements. It is for the modelling stage of the future strategic and alternative growth options that will bring together the collective consideration of Local Plan technical evidence.
		Do not consider that undesignated employment sites should get a ‘free pass’ through the assessment process. What makes a site acceptable in employment terms, does not also apply to housing sites.	Noted. This will be reviewed.
		Agree that genuine public open space should not be deemed suitable, so it will be important that the criteria for what is considered open space is clearly set out in the Methodology.	Noted. Further clarity will be added to the final SHLAA methodology to clarify how the approach relates to existing policy designations.
		Table 5 refers to constraints including Flood Risk Zone 2 and contamination, but does not note the approach that will be taken if sites are partially constrained by such factors.	Noted. Further clarity will be provided within the final SHLAA methodology.
		We support the consideration of site viability, particularly considering the Strategic Infrastructure costs related to larger sites. We have seen other local authorities struggle at Examination stage bringing forward large new communities as the infrastructure costs have not been realistically assessed. This should form an important consideration and the use of	Noted.

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		Government funding should only be factored in where there is significant progress in securing it.	
		We support the consideration of appropriate timescales for individual sites, but we consider it is important that infrastructure delivery timeframes are considered at this stage. Where funding is not progressed for significant and critical pieces of infrastructure then the relevant adjustments should be made to the site assessment.	Noted. A consistent approach will be applied across all sites requiring strategic infrastructure.
		We support the use of masterplans to guide assumptions about site density.	Noted.
		<p>In order to avoid unnecessarily returning to the SHLAA process, we would recommend seeking to deliver a wide variety of sites through this process and focus on the most sustainable and deliverable sites in the first instance. Having a large reservoir of sites will be key, but this will need to be full of appropriate sites that can be brought forward quickly to meet need, such as Land at Jesus Church.</p> <p>A site location plan of landholding is attached. Consider that the focus should be on the sustainable and deliverable sites that relate well to the existing built up settlement. This would include sites, such as Land at Jesus Church, Forty Hill, Enfield, which is considered suitable and deliverable. We have set this out in more detail in the appended Site Assessment at Appendix A1.</p>	Noted.
019	Savills on behalf of Crosstree Real Estate Partners LLP	Broadly endorse the Council's proposed methodology to identifying and assessing potential sites within the borough and the capacity of those sites to contribute towards the borough's housing land supply. Also includes a number of suggestions on the methodology.	Noted.
		Supportive of the list of data sources in Stage 1.	No action required.

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		<p>We do not wish to comment on the list of constraints forming the basis upon which sites should be excluded from further assessment. Suggest comments in relation to detailed steps.</p>	<p>Noted.</p>
		<p>Step 1 – Site Surveys - Support the range of proposed desk-based assessments. Question whether desk based officer assessment is appropriate for assessing owner intentions. Suggested text amendment: Owner intentions through discussion with the relevant stakeholders;</p>	<p>Noted. To be reviewed as required.</p>
		<p>[insert new bullet point] Whether the site has transformational or strategic scale potential to become a significant contributor towards housing provision within the borough, notwithstanding its current land use or character.</p>	<p>Noted. To be reviewed as required.</p>
		<p>Step 2: Assessing Availability- we support the proposed methodology</p>	<p>Noted.</p>
		<p>Step 3: Assessing Suitability- we support the proposed methodology</p>	<p>Noted.</p>
		<p>Step 4: Assessing Achievability- we support the principle of assessing the viability of a suggested site, we do not consider it appropriate to undertake generic viability testing when considering the achievability of large scale complex town centre development, particularly where landowners are willing to invest in sites with a view to increasing land values over time in such instances where a development site may not appear viable in the immediate term.</p> <p>We propose that general viability information and testing of sites, as suggested within the methodology, will not be sufficient for complex projects and would therefore request that landowners are invited to submit their own detailed viability evidence when this assessment</p>	<p>Noted. The approach to consideration of viability on more complex sites will be reviewed and revised as required.</p>

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		<p>is being undertaken by the Council. This would provide the Council with accurate viability information and allow them to make a more informed decision regarding likely achievability.</p> <p>Moreover, we would question whether it is possible for the Council to accurately determine whether a landowner has access to funding and what the status of any third party agreements might be without engaging directly with landowners. It is therefore suggested that the Methodology is amended in this respect to state that the Council will engage with landowners in order to secure accurate information as part of the assessment of achievability.</p>	
		<p>Step 5: Finalising Assessment Outcome- We do not wish to make any particular comments in relation to the Step. We do however support the approach to information gathering as stated at paragraph 2.31</p>	<p>No action required.</p>
		<p>Step 6: Site Capacity; the unique nature of these projects that makes it challenging to find suitable comparable schemes against which to benchmark an appropriate development density. For example, Edmonton Green is of such a significant scale and seeks to deliver significant benefits for the surrounding area. In this instances, the suitable development density should be driven by the design of a development and the supporting infrastructure, in accordance draft Policies D2, D3 and D4 of the draft New London Plan. We do not consider it appropriate in these instances to revert to the currently adopted (but soon to be deleted) London Plan Density Matrix.</p> <p>On the largest sites (10-15ha), we support the proposed methodology suggestion to reflect the additional land take required for non-residential development including on site infrastructure. However, we recommend that it would be appropriate and reasonable to consider carefully both gross and net densities, having regard to local context and recent similar developments.</p>	<p>Noted.</p>

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		<p>Stage 3: Determining Windfall Assessment</p> <p>We note the proposed methodology and do not wish to make comments on this Stage at this time.</p>	No action required.
		<p>Stage four includes a review of the development needs of the borough. We acknowledge the current uncertainties faced by the Council in identifying their housing need. It is considered that either housing target presents a significant challenge and it is therefore critical that the Council considers all suitable and deliverable housing development sites in detail and wherever possible, in discussion with landowners and stakeholders.</p>	Noted. No action required.
		<p>Stage 5: Assessing Core Outputs</p> <p>We note the proposed methodology and do not wish to make comments on this Stage at this time.</p>	No action required.
020	Savills on behalf of City and Suburban Homes	<p>A number of the same issues and concerns as highlighted within the representation on behalf of Crosstree Real Estate LLP are raised. These are not repeated for the sake of brevity. Additional unique comments are noted below.</p>	n/a – see above.
		<p>Question the inclusion of ‘Notified Safety Zones’ within absolute constraints. Whilst we do not support development in actively dangerous zones, we would like to ensure that decommissioned sites, for example redundant gas holders that may still be within this zone, are not discounted from the assessment. It is considered that utilising these sites which are capable of remediation will provide additional land for housing and employment and could therefore be considered where possible and relevant.</p>	Notified Safety Zones will be moved to Level 2.

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021	Savills_ Brimmsdown Landowners	A number of the same issues and concerns as highlighted within the representation on behalf of Crosstree Real Estate LLP are raised. These are not repeated for the sake of brevity. Additional unique comments are noted below.	n/a – see above.
		Broadly support the list of data sources in Stage 1. Suggest that the above table of data sources is updated to include any sites that are currently being progressed in discussion with the Council, outside of the standard pre-application channels and in particular, those that are confidential.	The Council will consider sites which have been submitted by developers as part of the Call for Sites. Developers in initial discussions are invited to submit a Call for Sites submission.
		Step 2 – Assessing availability - We do not object to the definition of ‘potentially available’ land. However, we would like to note that strategic scale development opportunity sites are likely to come with unresolved land ownership considerations and that this is typical of development proposals at that scale. Given the significant contribution towards housing land supply that such types of development can make, we would request that the Council recognise this as part of their assessment and do not consider sites that have yet to be resolved land ownership discussions as being undesirable, particularly if Officers are not in discussion with the relevant landowners and stakeholders to discuss this matter.	Noted. This will be reviewed in line with guidance.
		Step 3 – Assessing Suitability - The Methodology states that sites will be tested against a range of criteria as part of this step. These criteria include employment. As currently worded we consider the criteria to be overly restrictive and at odds with draft Intent to Publish New London Plan policy E7. The draft methodology’s stance on the assessment of sites in economic use would effectively preclude co-location of residential development alongside designated LSIS and sites that are currently in and will continue to remain in economic use. Suggests addition of following wording: “Sites which are currently designated for economic uses and are capable of co-locating residential uses within them in accordance with the requirement of draft Policy E7 of the draft New London Plan (or any subsequent replacement policy), will generally be deemed potentially suitable for housing.”	Sites which are currently designated LSIS or are undesignated sites in industrial use are potentially capable of co-locating residential uses within them in accordance with the requirement of draft Policy E7 of the draft New London Plan (i.e. no net loss of industrial capacity and no adverse impacts on the actual or potential functioning of the surrounding area as a business

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		Notwithstanding, the sites with policy constraints to be considered within Table 5 includes SIL and LSIS which appears to be at odds with paragraph 2.22 of the draft SHLAA methodology.	location). Such sites will generally be deemed potentially suitable for some housing.'
022	Highways England	Having examined the Enfield's Draft Strategic Housing Land Availability Assessment (SHLAA) Methodology Consultation, we do not have any comments to make on the proposed methodology and believe its methodology or policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para's 9 & 10 and MHCLG NPPF para 109).	No action required.
023	Savills on behalf of Comer Group Vicarage Farm	Do not have any observations on the methodology per se, which appears to follow the London Plan SHLAA Methodology, however, we do have some detailed comments on a specific aspect of the approach. Concerned that the inclusion of Flood Zone 3 within Table 5 should not automatically preclude sites where this only applies to a portion of the site.	Noted. Further clarity will be provided within the final SHLAA methodology.
024	Conservative Group	Mentions that the two weeks consultations is limited and not been properly publicised.	The concern is noted. The consultation is not a statutory consultation, but a technical consultation to improve the methodology. Public consultation on the draft SHLAA methodology is not mandatory. Nevertheless, the council have sought views from stakeholders to provide them the opportunity to input and help refine the methodology before we begin the study.

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		Object to proposed discretionary changes in the criteria for development within the Green Belt, Metropolitan Open Land, Public Open space and Local Green Space that have been included.	Noted.
		Given that the proposed methodology seeks to widen the number of sites and areas within the borough that are to be considered available for housing development, it is odd that in paragraphs 2.15-2.20 it should severely restrict the criteria for availability.	The approach to assessing availability will be in line with Planning Practice Guidance.
		The NPPF states that it is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desk-top review process that may assist in meeting the development needs of an area.	Noted. The National Planning Practice Guidance also requires sites to be considered in relation to their availability. Factors that can be considered when assessing availability include where there is confidence that there are no legal or ownership impediments to development. ⁴
		Main concerns are reflected in responses we have seen from interested local organisations relate to all the Level 2 sites, particularly with respect to Green Belt and MOL. Have similar objections to other Level 2 sites within Table 5.	See above responses in relation to Green Belt, and Agricultural Land.
		Although Government guidance encourages a comprehensive review of all land assets, it doesn't require Council's to look for reasons to de-designate the Green Belt or MOL. This was confirmed by the Mayor of London in a letter in February 2019.	Noted.

⁴ Paragraph: 019 Reference ID: 3-019-20190722

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		Dismayed that exercise may have to be revisited if not enough sites are found.	Subsequent reviews will be undertaken in line with national planning practice guidance.
		Recommend that all brownfield sites within the borough where development potential is currently unknown should be identified and included in this exercise.	The Council will take a proportionate approach, in line with national planning practice guidance, to inclusion of Brownfield sites.
		Recommend that existing Green Belt and other green spaces are afforded maximum protection possible.	Noted.
025	Walbrook Planning	<p>This representation states that the draft methodology positively engages with the spectrum of criteria, policies and constraints that need to be assessed in the SHLAA. It represents a strong basis due to its consistency with PPG, its breadth of issues covered and the proactive stance it takes towards acknowledging the potential for sites to have individual merit to overcome certain constraints, such as Green Belt land. As such Walbrook Planning believe it does not need extensive or structural changes, rather just the addition of more detail and certainty for specific aspects of the suitability assessment. Overall, the structure and criteria for sites to be considered within the SHLAA appears to be suitable and well-reasoned within the methodology.</p> <p>A key strength of the draft methodology is the consistency in how sites will be categorised against the four assessments listed (as demonstrated in Tables 4, 6, 7 and 8). It is recommended that this classification is maintained to ensure the legibility of the final SHLAA report, and such that the reasons for excluding a site are justified and evidenced.</p>	Noted. No action required.
		The criteria within Level 1 (sites to be excluded) are all justifiable constraints that will prevent any development from occurring where they are present. Table 5 is effective in demonstrating the divide between what can be determined 'absolute constraints' and those	Noted. No action required.

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		<p>that may still warrant consideration of a site. It is promising to see that certain characteristics and designations such as Green Belt land, are situated within Level 2 of Table 5. The methodology appears to strike a good balance between applying the implications of constraints to sites and still considering them on a site by site basis.</p>	
		<p>The draft methodology states that evidence from landowners/promoters will be taken into account to determine the availability of sites. Whilst this is a good action to take, the other assessment steps fail to mention collaboration with landowners/promoters. In order to improve upon the draft methodology, Walbrook Planning propose that the potential for dialogue between landowners/promoters and the Borough is present at each step of the assessment process.</p>	<p>Noted. The Council will work collaboratively with landowners / promoters as required.</p>
		<p>Due to the nature of assessing land for development potential, there is some overlap between a SHLAA report and a Green Belt Review. Walbrook Planning feel there needs to be greater detail in the methodology to ensure sites are assessed at a microscale. Green Belt reviews are often too broad-brush in nature which results in smaller scale parcels within a wider area not being given the due consideration they concern. This was picked up at St Albans Local Plan examination by the inspector. Green Belt Reviews rarely identify sites down to the scale that will be considered in the SHLAA. This can mean that smaller sites which may make a lower contribution to the Green Belt purposes in isolation, are aggregated into larger parcels that are classed as strongly performing.</p>	<p>Noted. The SHLAA will be a living document that is updated annually. This will allow the SHLAA findings to be updated and revised following publication of any technical evidence relating to the Green Belt.</p>
		<p>The draft methodology indicates that exceptions to consideration of Green Belt sites might occur in strong performing areas, for example where sites are previously developed. There are a number of uncertainties and questions that arise from the lack of detail, including but not limited to:</p> <ul style="list-style-type: none"> • How will sites that are previously developed be identified? • Will the SHLAA only consider sites that are fully previously developed, or will partially developed sites be included? 	<ul style="list-style-type: none"> • PDL sites will be identified in line with the NPPF definition. • The Council will consider all sites from the sources listed in Stage 1. Where sites contain a mixture of PDL and greenfield land the approach will be

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
		<ul style="list-style-type: none"> • Will there be engagement with landowners/promoters to clarify whether a site is previously developed if the evidence is unclear? • Should previously developed sites include those without formal confirmation of their PDL status, and also include consideration of the built form on site? 	<p>clarified and applied consistently.</p> <ul style="list-style-type: none"> • Engagement with landowners will take place if required.
		<p>The sustainability of a site's location is a key factor that should be included in the SHLAA, but the current methodology does not, in Walbrook Planning's view, provide adequate detail on how this will be considered. It should be specified within the methodology that different facets of sustainability (e.g. access to transport, shops, open space, community facilities, etc.) will each be considered in order to provide a more detailed analysis of the connectivity and sustainability of a site.</p>	<p>Noted. The proposed approach will be reviewed and revised as required.</p>
026	HGH Consulting on behalf of Landvest Crews Hill Ltd	<p>Landvest supports the SHLAA Methodology. The Park View Nursery site (Parkview Place) has been submitted to the Council as part of the earlier 'Call for Sites' consultation.</p>	<p>Noted. No action required.</p>
027	Hadley Wood Association	<p>The Hadley Wood Neighbourhood Planning Forum strongly objects to proposed changes in the criteria for development within the Green Belt, MOL, Public Open Space and Local Green Space that are included in the draft SHLAA.</p> <p>They note that there has been no public notification and this does not even appear on the Current Consultation page of the Enfield Council website, plus a period of only 2 weeks is totally inadequate for changes of such significance</p>	<p>Noted.</p> <p>The concern is noted. The consultation is not a statutory consultation, but a technical consultation to improve the methodology. Public consultation on the draft SHLAA methodology is not mandatory. Nevertheless, the council have sought views from stakeholders to provide them the opportunity to input and help</p>

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			refine the methodology before we begin the study.
028	The Enfield Society	<p>The Enfield Society has two main concerns with the Draft Strategic Housing Land Availability Assessment Methodology –</p> <ul style="list-style-type: none"> • That there is insufficient reference to the need to protect the Green Belt & • That the document submitted by the Society in partnership with Enfield Roadwatch and CPRE under the ‘call for sites’ has not been fully investigated. Recognising sites must be shown to be available, it notes that “If there are doubts about a site it can be identified as potential development in the 10- or 15-year periods.” <p>They mention in paragraph 2.18 of the draft methodology, ... that the Council would carry out proportionate investigation and evidence gathering about such sites. If the submitted documentation was not reviewed as such we would ask that the Council amend the methodology to include all submissions by third parties, at any time, perhaps acknowledging that the Council may not have the resources to investigate all sites and that priority is given to the larger sites.</p>	<p>The purpose of the SHLAA is not to restate policy.</p> <p>Noted.</p> <p>The proposed approach to assessing availability is in line with the planning practice guidance.</p>
029	Natural England	<p>Natural England provided a generic advice on key natural environment considerations in line with the National Planning Policy Framework, such as Landscape, Biodiversity and Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations. As they do not have staff resources available to provide bespoke advice on SHLAAs.</p>	<p>Noted. Methodology to be reviewed in light of guidance and amended as required.</p>
030	Canal & Rivers Trust	<p>Comment is on flood risk- while the Council will exclude sites in flood zone 3- there is no reference to flood defences. The Canal & River Trust owns land in Enfield, and this is at risk of flooding but is protected by defences.</p>	<p>Low and medium flood risk categories are based on the Environment Agency flood risk data for rivers and sea. Areas in high risk - Zone 3b – have been collated from borough level Strategic Flood Risk Assessments (SFRAs). This aligns with the</p>

No.	Organisation details	Summary of main issue with reference Section or paragraph	Council response
			SHLAA methodology of the Draft New London Plan.